

Remarks

Claims 1 and 13 were previously amended. Claims 8 and 13 are currently amended. Claim 20 was previously cancelled. Claims 1-19 are pending in this application. The Examiner has rejected claim 1-14, 16-19 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 7,123,248 to Lafleur (hereinafter “Lafleur”) in view of U.S. Patent No. 6,903,706 to Trottier et al. (hereinafter “Trottier”). The Examiner has rejected claim 15 under 35 U.S.C. § 103(a) as being unpatentable over Lafleur and Trottier et al. as applied to claim 14, and further in view of U.S. Patent Publication No. U.S. 2005/0118880 to Reichle (hereinafter “Reichle”). Applicant respectfully traverses the Examiner’s rejections.

A. Remarks Regarding Rejection of Claims 1-14, 16-19 under 35 U.S.C. § 103(a)

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). “All words in a claim must be considered in judging the patentability of that claim against the prior art.” *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970). If an independent claim is nonobvious under 35 U.S.C. § 103, then any claim depending therefrom is nonobvious. *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988).

The combination of Lafleur and Trottier fails to teach or suggest a video display controller “configured to be coupled to a dongle *through* the display device connector” as required by independent claims 1, 8, and 13. The Examiner identifies Lafleur Figure 3, element 6 as the single display device connector of independent claim 1, and Figure 3, element 8 as a dongle in rejecting the claimed limitation. (Office Action, p. 3). Even assuming that the identified Lafleur components map to corresponding claimed components as argued, a point the Applicants do not concede, Lafleur does not teach a video display controller “configured to be

coupled to a dongle *through* the display device connector.” At best, Lafleur teaches a video display controller which requires control circuitry (Lafleur Figure 3, element 8) to be coupled directly to a video processor (Lafleur Figure 3, element 4) and a display connector (Lafleur Figure 3, element 6). Examiner equates the enabler (element 8) to the dongle and the connector (element 6) to the display device connector of independent claim 1. Office Action at 3; Lafleur at Figure 3. Figure 3 of Lafleur explicitly shows the enabler connected directly to the video processor rather than *through* the display device connector as required by independent claim 1. Thus, the Lafleur invention is not “configured to be coupled to a dongle *through* the display device controller.” A similar analysis applies to independent claims 8 and 13.

Because all of the elements of independent claims 1, 8, and 13 are not taught or suggested by the combination of Lafleur and Trottier, a *prima facie* case of obviousness is not established. Applicants respectfully request that the rejection of independent claims 1, 8, and 13 should be withdrawn and that these claims should be passed to issuance. Claims 2-7, 9-12, 14, 16-19 will not be discussed individually herein, as each of these claims depends, either directly or indirectly, from an otherwise allowable base claim and are therefore requested to be passed to issuance for at least the same reasons as stated above with respect to independent claims 1, 8, and 13.

B. No Waiver

All of Applicants arguments and amendments are without prejudice or disclaimer. Additionally, Applicants have merely discussed example distinctions from the cited references. Other distinctions may exist, and Applicants reserve the right to discuss these additional distinctions in a later Response or on Appeal, if appropriate. By not responding to additional statements made by examiner, Applicants do not acquiesce to examiner’s additional statements,

such as, for example, any statements relating to what would be obvious to a person of ordinary skill in the art. The example distinctions discussed by Applicants are sufficient to overcome the anticipation rejections. The current amendments to the claims are sufficient to overcome the novelty and obviousness rejections.

Conclusion

Applicants respectfully submit that the pending claims 1-19 of the present invention, as amended, are allowable. Applicants respectfully requests that the rejection of the pending claims be withdrawn and that these claims be passed to issuance.

Respectfully submitted,



Tammy M. Pennington
Registration No. 61,223

Baker Botts L.L.P.
910 Louisiana
One Shell Plaza
Houston, Texas 77002-4995
(713) 229-1972

Baker Botts Docket Number: 016295.1517

Date: September 29, 2008